

EXHIBIT 20



**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**In Re: Methyl Tertiary Butyl Ether ("MTBE")
Products Liability Litigation**

This document relates to:

*New Jersey Department of Environmental
Protection v. Atlantic Richfield Co., et al.*
No. 08 Civ. 00312

Master File No. 1-00-1898
MDL 1358 (SAS): M21-88

**PLAINTIFFS' OBJECTIONS AND RESPONSES TO
DEFENDANTS' REQUESTS FOR ADMISSION AND
REQUEST FOR PRODUCTION OF DOCUMENTS REGARDING
TRIAL SITE NJDEP LEONARDO STATE MARINA**

PLEASE TAKE NOTICE that, pursuant to Rule 36 of the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York, Plaintiffs New Jersey Department of Environmental Protection, Commissioner of the New Jersey Department of Environmental Protection, and the Administrator of the New Jersey Spill Compensation Fund (collectively, "Plaintiffs") hereby respond to the Defendants' Requests for Admission (the "Requests for Admission") and Request for Production of Documents Regarding Trial Site NJDEP Leonardo State Marina, as follows:

GENERAL OBJECTIONS AND LIMITATIONS

1. Plaintiffs object to the Requests for Admission to the extent they seek information covered by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity. Plaintiffs' responses are not intended as, nor should they be construed as, a waiver or relinquishment of any part of the protections afforded by the attorney-client privilege, the work product doctrine, or any other applicable privileges or immunities. Plaintiffs reserve the right to withdraw and recover any information covered by such privileges or

4. The SITE is owned by the State of New Jersey, Department of Environmental Protection, Division of Parks and Forestry. *See, e.g.*, NJDEP TESTIMONY p. 29.

RESPONSE:

It is denied that the Marina is named the NJDEP Leonardo State Marina and that it is owned by Plaintiff New Jersey Department of Environmental Protection. To the contrary, the proper name of the facility is Leonardo State Marina and it is owned by the State of New Jersey.

5. The SITE has been operated by the NJDEP at all times relevant to this litigation. *See, e.g.*, NJDEP TESTIMONY p. 32-33.

RESPONSE:

Admitted.

6. The USTs located at the SITE are owned by the NJDEP. *See, e.g.*, NJDEP TESTIMONY p. 31.

RESPONSE:

Admitted.

7. A release from the USTs at the SITE was identified in 1994. *See, e.g.*, NJDEP TESTIMONY p. 36.

RESPONSE:

Admitted.

8. Visual evidence of leaking was identified around the base of the pump associated with an underground storage tank at the SITE in 1994. *See, e.g.*, DPMC-026706.

RESPONSE:

Admitted.

9. Organic Vapor Analyzer readings taken during the subsurface investigation of the SITE in 1994 indicated odors. *See, e.g.*, DPMC-026707.

RESPONSE:

Admitted.